

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**CELESTE J. MATTINA, Regional Director,
Region 2, National Labor Relations Board, for
and on Behalf of the NATIONAL LABOR
RELATIONS BOARD,**

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

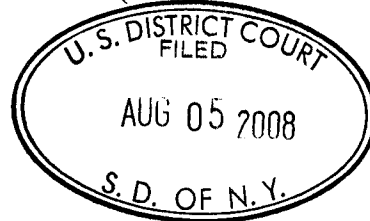
Petitioner,

08-CV-6550 (DLC)

v.

**KINGSBRIDGE HEIGHTS REHABILITATION
AND CARE CENTER,**

Respondent.



PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, MICHAEL J. SCIOTTI, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

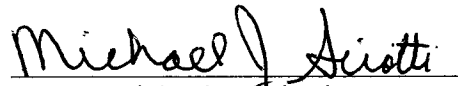
John T. McCann
Hancock & Estabrook, LLP
1500 AXA Tower I
100 Madison Street
Syracuse, New York 13202
Telephone: (315) 471-3151
Fax: (315) 471-3167

Lindsey H. Hazelton
Hancock & Estabrook, LLP
1500 AXA Tower I
100 Madison Street
Syracuse, New York 13202
Telephone: (315) 471-3151
Fax: (315) 471-3167

John T. McCann and Lindsey H. Hazelton are both members in good standing of the Bar of the State of New York. There are no pending disciplinary proceedings against John T. McCann or Lindsey H. Hazelton in any State or Federal court.

Dated: July 31, 2008
Syracuse, New York

Respectfully submitted,

A handwritten signature in black ink, reading "Michael J. Sciotti". The signature is written in a cursive style with a horizontal line underneath it.

Michael J. Sciotti
Bar No. MS0007
Hancock & Estabrook, LLP
1500 AXA Tower I
100 Madison Street
Syracuse, New York 13202
Telephone: (315) 471-3151
Fax: (315) 471-3167

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**CELESTE J. MATTINA, Regional Director,
Region 2, National Labor Relations Board, for
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Petitioner,

v.

**KINGSBRIDGE HEIGHTS REHABILITATION
AND CARE CENTER,**

Respondent.

**AFFIDAVIT OF MICHAEL J.
SCIOTTI IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE
08-CV-6550 (DLC)**

State of New York)
County of Onondaga) ss.:

MICHAEL J. SCIOTTI, being duly sworn, hereby deposes and says as follows:

1. I am a Partner with Hancock & Estabrook, LLP, counsel for Respondent in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of Respondent's motion to admit John T. McCann and Lindsey H. Hazelton as counsel pro hac vice to represent Respondent in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 1992. I am admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court. I am also admitted to the bars of the Northern, Western and Eastern District Courts of New York, the Second Circuit Court of Appeals, the United States Supreme Court and am a member in good standing of these Bars as well.

3. I have known John T. McCann since 1990. He is a partner at Hancock & Estabrook, LLP in Syracuse, New York. I know Mr. McCann to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. He is admitted to practice before the Northern and Western District Courts of New York and the Second Circuit Court of Appeals.

4. I have known Lindsey H. Hazelton since 1997. She is a partner at Hancock & Estabrook, LLP in Syracuse, New York. I know Ms. Hazelton to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules

of Procedure. She is admitted to practice before the Northern and Western District Courts of New York and the Second Circuit Court of Appeals.

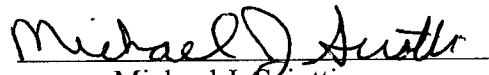
5. Mr. McCann and Ms. Hazelton have familiarity with the legal issues in the instant proceeding and Respondent's interests are best served by allowing Mr. McCann and Ms. Hazelton to represent them in this case.

6. I respectfully submit a proposed Order granting the admissions of John T. McCann and Lindsey H. Hazelton, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit John T. McCann and Lindsey H. Hazelton, pro hac vice, to represent Respondent in the above captioned matter, be granted.

Dated: July 31, 2008
Syracuse, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Sciotti", is written over a horizontal line.

Michael J. Sciotti

SDNY Bar No.: MS0007

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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v.

**KINGSBRIDGE HEIGHTS REHABILITATION
AND CARE CENTER,**

Respondent.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

08-CV-6550 (DLC)

Upon the motion of MICHAEL J. SCIOTTI , attorney for Respondent and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

John T. McCann
Hancock & Estabrook, LLP
1500 AXA Tower I
100 Madison Street
Syracuse, New York 13202
Telephone: (315) 471-3151
Fax: (315) 471-3167

Lindsey H. Hazelton
Hancock & Estabrook, LLP
1500 AXA Tower I
100 Madison Street
Syracuse, New York 13202
Telephone: (315) 471-3151
Fax: (315) 471-3167

are admitted to practice pro hac vice as counsel for Respondent in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: August __, 2008
Syracuse, New York

United States District Judge



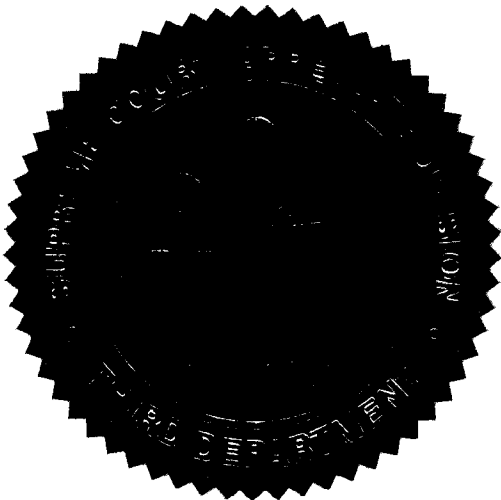
State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

John Timothy McCann

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 25th day of January, 1983, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 30th day of July, 2008.



Michael J. Novack

Clerk

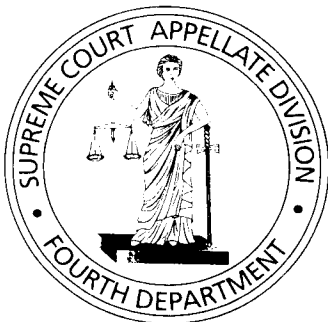
**SUPREME COURT OF
THE STATE OF NEW YORK
APPELLATE DIVISION, FOURTH DEPARTMENT
ROCHESTER, NEW YORK**

I, JOANN M. WAHL, Clerk of the Appellate Division of the Supreme Court in the Fourth Judicial Department, State of New York, do hereby certify that

LINDSEY HELMER HAZELTON

*was duly admitted to practice as an attorney and counselor at law in all courts of this state by this Court on, **February 18, 1998**, and appears in good standing upon the roll of attorneys and counselors, and other records, in this office and has registered with the administrative office of the Courts as required by Judiciary Law §468-a.*

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of this Court, at the City of Rochester, July 30, 2008.



Joann M. Wahl

Clerk of the Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CELESTE J. MATTINA, Regional Director,
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AND CARE CENTER,

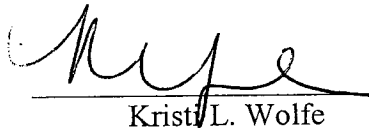
Respondent.

CIVIL ACTION NO.
08-CV-6550 (DLC)

STATE OF NEW YORK)
COUNTY OF ONONDAGA) SS.:

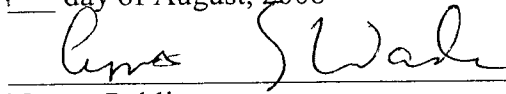
Kristi Wolfe, being duly sworn, deposes and says: that your deponent is not a party to the within action, is over 18 years of age, and that your deponent resides in Onondaga County, New York. That on the 1st day of August, 2008, your deponent served the following: Motion for Admission Pro Hac Vice with supporting papers upon the attorney for Petitioner at the address listed below by causing a true copy of same, enclosed in a postpaid properly addressed wrapper, to be deposited into an official FEDERAL EXPRESS depository under the exclusive care and custody of Federal Express.

James C. Rucker
Counsel for Petitioner
National Labor Relations Board
Region 2
26 Federal Plaza, Room 3614
New York, New York 10278-0104



Kristi L. Wolfe

Sworn to before me this
1st day of August, 2008



Notary Public

CYNTHIA E. WADE
Notary Public, State of New York
No. 4650183
Qual. in Onon., Mon., & Os. Counties
My Commission Expires Dec. 31, 20 09